



March 14, 2018

Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Kathryn Ross, Paralegal
999 E Street, NW
Washington, DC 20463

Re: MUR-7329

Dear Ms. Ross:

The Virgin Islands Republican Party (VIGOP), a State Party Committee filed with the Federal Election Commission operates on both the federal and nonfederal levels. All federal activity is reported to the Commission in disclosure reports filed monthly. The nonfederal activity is disclosed to the Election System of the Virgin Islands.

The complaint filed by the Campaign Legal Center (CLC) alleges "...apparent campaign finance violations by both the federal or territorial committees..." VIGOP adamantly disagrees with the CLC accusations as they are completely unfounded. This response deals solely with the claims against the federal committee.

The complaint focus' on the "Virgin Islands GOP Event" held on March 30, 2017. CLC claims that "...there are many indications that this event was a fundraiser for the Virgin Islands GOP's federal committee..." however, CLC does not list these "indications". In their complaint, CLC admits that this is a fundraiser for its Territorial Committee, which it was.

None of the contributions from the March 30th event were reported to the Commission on its monthly disclosure reports, because none of those contributions were deposited to the federal bank accounts. Contributions to the event were deposited to a territorial bank account and disclosed as required to the VI Election System, despite the non-disclosure assertion by CLC.

The federal committee did make the following disbursements as stated by CLC:

LN #	RPT ID	ORGANIZATION	FEC-DATE	PAY AMT	PURPOSE
SB21B	SB21B.12847	RENAISSANCE ST CROIX	20170515	833.80	DENNIS LENNOX E/R - ACCOMODATIONS (3/31/2017)
SB21B	SB21B.26725	MOTTA CUISINE	20170330	874.60	VIGOP EVENT
SB21B	SB21B.41138	DEPARTMENT OF THE INTERIOR	20171005	274.29	REIMBURSEMENT

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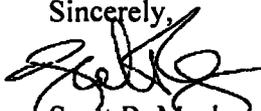
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The disbursements made above and totaling \$ 1,982.69 that are related to the March 30th territorial fundraising event are made in accordance with 11 CFR §106.7(d)(4) which provides that direct fundraising costs may be paid by a combination of federal and nonfederal funds.

CONCLUSION

The March 30th fundraiser was a nonfederal (Territorial) event. Therefore, the allegation that VIGOP (C00553560) has failed to disclose contributions related to the event is a false claim. The assertion by CLC that VIGOP has violated any provision of the Federal Election Act is unfounded and the committee requests that the Commission dismiss this complaint.

Sincerely,



Scott B. Mackenzie
Treasurer

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